

MUKASEY FRENCHMAN

570 Lexington Avenue, Suite 3500
New York, NY 10022

Marc L. Mukasey
Partner
212-466-6406
Marc.mukasey@mfsllp.com

MEMO ENDORSED

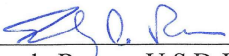
November 3, 2022

VIA ECF

The Honorable Edgardo Ramos
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. Milton, 21-cr-478 (ER)

The request for an initial, 30-day, extension of time to file post-trial motions under Fed. R. Crim. P. 29 and 33 is granted. SO ORDERED.


Edgardo Ramos, U.S.D.J.
Dated: November 4, 2022
New York, New York

Dear Judge Ramos:

This letter is respectfully submitted on behalf of defendant Trevor Milton to request a 30 day extension of time to file post-trial motions under Fed. R. Cr. P. 29 and Rule 33. At present, the motions are due on November 14, 2022. The additional 30 days would make the new submission date December 14, 2022.

The extra time sought is necessary for two primary reasons. First, as the Court is aware, the trial record in this matter is extensive. Second, it has come to our attention that after the verdict, several jurors made comments and statements to the media and/or online concerning the trial and the deliberations. The defense believes these comments must be carefully reviewed and analyzed in connection with the post-trial motions.

The government consents to this requested extension of time, although the above-mentioned reasons for the request are solely those of the defense.

Respectfully submitted,

/s/ Marc L. Mukasey
Marc L. Mukasey

Cc: All counsel of record (via ECF)